

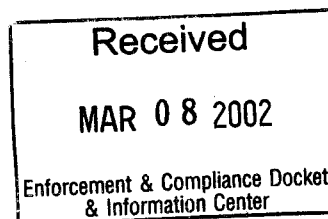


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February 25, 2002

United States Environmental Protection Agency  
Enforcement and Compliance Docket and Information Center  
(Mail Code 2201A)  
Attn: Docket Number EC-2000-007  
1200 Pennsylvania Avenue NW.  
Washington, D.C. 20460



SUBJECT: Cross-Media Electronic Reporting and Recordkeeping Rule, "CROMERRR"

Dear Sir:

The Occidental Chemical Corporation (OxyChem) Castle Hayne Plant located in southeastern North Carolina appreciates the opportunity to provide comments on the Environmental Protection Agency's proposal of the Cross-Media Electronic Reporting and Recordkeeping Rule, known as "CROMERRR". The OxyChem Castle Hayne Plant is one of the world's largest manufacturers of chromium chemicals and the facility is supportive of the comments submitted by the American Chemistry Council as part of this docket.

The OxyChem Castle Hayne Plant is actively engaged in the collection of environmental data, necessary to comply with Federal and State regulations. The only way to efficiently manage the volume of plant data collected is by utilizing computer systems. Under the proposed rule, every information system that maintains electronic records of environmental data would need to be checked for compliance with CROMERRR. This has the potential to affect hundreds of records within the plant and would be extremely time consuming and costly. When multiplied by the thousands of companies to which CROMERRR would apply, the costs of the proposed rule far outweigh the benefits.

The voluntary recordkeeping provisions contained in CROMERRR for all practical purposes would be mandatory because CROMERRR's definition of "electronic record" includes any data that ever passes through a computer, at any stage in the life of the information. Under CROMERRR an electronic record must meet specific standards or it would no longer satisfy recordkeeping requirements. Paper recordkeeping is not an option because records are typically generated electronically and the volume of data collected make paper recordkeeping impractical.

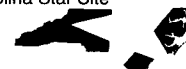
Implementing the authenticity, integrity, and long-term availability of electronic records in the manner that CROMERRR dictates, would be especially burdensome because of the susceptibility of records to inevitable advances in computer hardware and software. The OxyChem Castle Hayne Plant could be required to maintain a separate data collection system, simply for data storage and retrieval purposes, comprised of out-of-date, or obsolete equipment in order to comply with CROMERRR.



**Occidental Chemical Corporation**

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Carolina Star Site

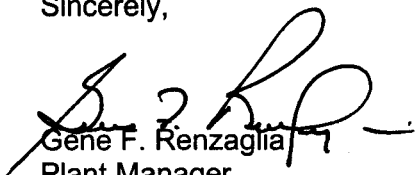


The OxyChem Castle Hayne facility currently reports environmental data electronically to the state of North Carolina. As proposed under CROMERRR the plant would not be able to continue this practice and would be forced to revert back to the process of submitting paper reports, thereby eliminating substantial benefits for OxyChem and the State of North Carolina.

The OxyChem Castle Hayne Plant has strong reservations about the recordkeeping requirements imposed by CROMERRR and we believe that the costs of the secure, computer-generated, time-stamped audit trail requirements would far exceed the savings obtained by electronic reporting. For the above reasons, it is recommended that that EPA withdraw the proposed rule.

Again, we appreciate the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Gene F. Renzaglia", is written over the printed name.

Gene F. Renzaglia  
Plant Manager  
Occidental Chemical Corporation  
Castle Hayne Plant